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BEFORE THE ARIZONA CORPORATION COMMISSION

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2006 SEP 18 P 4: 18  
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Arizona Corporation Commission  
**DOCKETED**

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IN THE MATTER OF THE COMPLAINT  
OF BUREAU OF INDIAN AFFAIRS,  
UNITED STATES OF AMERICA,  
AGAINST MOHAVE ELECTRIC  
COOPERATIVE, INC. AS TO SERVICES  
TO THE HAVASUPAI AND HUALAPAI  
INDIAN RESERVATIONS.

DOCKET NO. E-01750A-05-0579

**MOHAVE ELECTRIC  
COOPERATIVE'S STATEMENT OF  
INTENT REGARDING FILING A  
JOINT ASSISTANCE PLAN**

Mohave Electric Cooperative, Inc. ("Mohave"), files this Statement of Intent regarding filing a joint assistance plan to ensure its intended actions and current efforts are consistent with the directive of the Commission.

During the procedural conference conducted in this matter on September 7, 2006, three recent power outages to and within the Havasupai reservation were discussed. Two of the outages, of relatively short duration, were due to storm related damage to the 70-mile transmission line at issue in this case. The third outage, of much longer duration (lasting for several days in July 2006), was completely internal to the Havasupai system operated by the Bureau of Indian Affairs ("BIA") on the Havasupai reservation. Mohave understands that storm activity was also the cause of that outage. The length of the third outage created significant public health and safety concerns for the residents served by the BIA.

During the procedural conference, Mohave committed to work with the BIA, other neighboring electric utilities (Arizona Public Service Company and UNS Electric) and regional relief agencies to formulate a cooperative assistance plan to address similar

1 unplanned lengthy outages that can threaten the public health and safety. Mohave  
2 understands both MEC and the BIA are to respond to the Commission's directive to formulate  
3 a joint community assistance plan. Mohave is in the process of contacting potential  
4 participants and anticipates filing (jointly with the BIA, other local utilities, and local relief  
5 agencies) a community-wide assistance plan to address long-term power outages that have the  
6 potential for creating significant public health and safety risks.

7           Mohave intends to be a good neighbor. It believes that planning to avoid and to  
8 respond to disasters is imperative and represents an effective way to protect the public health  
9 and safety. Such planning also helps to minimize adverse consequences from both natural  
10 and man-made disasters. Mohave welcomes the opportunity to play a leading role in  
11 developing a community-wide assistance/response plan for long-term power outages in areas  
12 within and in proximity to Mohave's certificated area. Mohave will examine the resources it  
13 has available to offer neighboring electric utilities (and the communities they serve) in times  
14 of long-term power outages. To be effective, its fellow utilities (the BIA, UNS and APS), the  
15 communities served and relief agencies all must join in the effort and agree upon a  
16 coordinated plan of action. Mohave's effort will focus on facilitating coordination between  
17 all electric providers in the area, in conjunction with relief agencies.

18           Mohave makes the present filing to ensure that there is no misunderstanding  
19 regarding how Mohave is proceeding and to emphasize that the BIA (and others) are  
20 necessary participants for a viable community-wide assistance/response plan for long-term  
21 power outages. In the event the approach outlined above is inconsistent with the expectations  
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1 of the Commission, we ask that there be a further meeting scheduled to discuss the nature and  
2 scope of the Plan.

3 RESPECTFULLY SUBMITTED this 18<sup>th</sup> day of September, 2006.

4 CURTIS, GOODWIN, SULLIVAN,  
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6  
7 By: 

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1 PROOF OF AND CERTIFICATE OF MAILING

2 I hereby certify that on this 18<sup>th</sup> day of September, 2006, I caused the  
3 foregoing document to be served on the Arizona Corporation Commission by delivering the  
4 original and thirteen (13) copies of the above to:

5 Docket Control Division  
6 ARIZONA CORPORATION COMMISSION  
7 1200 West Washington Street  
8 Phoenix, Arizona 85007

9 Copies of the foregoing hand delivered/mailed  
10 this 18<sup>th</sup> day of September, 2006 to:

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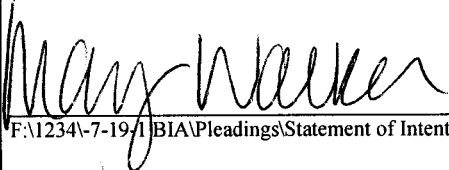
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